



200 Petroleum Square Two  
1324 N. Hearne Avenue  
Shreveport, Louisiana 71107

P.O. Box 78588  
Shreveport, LA 71137-8588

Phone: (318) 221-6282

Fax: (318) 213-1270

Website: [www.aeropres.com](http://www.aeropres.com)

# Memorandum

**To:** Steve Thompson  
**CC:** Phillip Brooks  
**From:** Mark Rivers  
**Date:** 2/19/2013  
**Re:** Information Request from EPA

---

Please find the attached information per your request dated January 23<sup>rd</sup> 2013:

1. List all products Aeropres manufactures, formulates or otherwise creates, or distributes to Enviro-Safe Refrigerants, Inc. (Enviro-Safe). Provide all names the product is sold under and/or known as for each such product.
  - a. Aeropres supplies Enviro-Safe with two types of propane (A-108), propane (A108 high ethane), and a blend of propane and butane (AB-70). The parenthetical reference is an Aeropres specific nomenclature which refers to the constituents and associated vapor pressure. For example AB-70 refers to a blend of propane/butane which has a vapor pressure of 70 psig at 70 degrees Fahrenheit. "A" blends denote Propane/Isobutane blends and "AP" refers to a blend of Propane/Isobutane/nbutane. AB designates?)Response prepared and submitted by Mark Rivers
2. State the date on which Aeropres and Enviro-Safe entered into a business relationship in which Aeropres agreed to manufacture, formulate or otherwise create, or distribute products to Enviro-Safe.
  - a. Aeropres and Enviro-Safe entered into a business relationship in the late 1990's. Following a search for records, we have determined that our records do not reflect the exact timing of the initiation of that relationship. Response prepared and submitted by Joe Bowen

3. State which of Aeropres' facilities produces the products sold to Enviro-Safe.
  - a. Aeropres Corporation 26060 U.S. Route 52, Manhattan, IL & 6440 E. Collins Rd., Morris, IL. Response prepared and submitted by Mark Rivers
4. State whether each product which Aeropres manufactures, formulates or otherwise creates for Enviro-Safe:
  - a. Is sold to any other companies, including companies in other industries.
    - i. The products shipped to Enviro-Safe are sold to many companies for uses in aerosol propellants, blowing agents and specialty chemicals.
  - b. Can be used for other functions beyond refrigeration.
    - i. See 4a Response prepared and submitted by Mark Rivers
5. Describe the relationship between Aeropres and Enviro-Safe detailing communication between both companies, including correspondence between each company's manufacturing facilities, for all products sold to Enviro-Safe Refrigerants. This includes collaboration on product formulas, directions, ingredients, and process steps. Provide all documentation of the above activities and all associated communication between Enviro-Safe and Aeropres.
  - a. Enviro Safe represents less than .004% of Aeropres' total annual sales volume. An Aeropres Regional Sales Manager would typically call on Enviro Safe twice per year. Aeropres will correspond with Enviro Safe monthly via email in order to communicate the current pricing which changes monthly. The amount of monthly contact between Aeropres and Enviro Safe is minimal. Aeropres has had no involvement with Enviro Safe with regard to recommending formulations or sharing process steps. All correspondence between Aeropres and Enviro Safe located in Aeropres' files is attached. Response developed and prepared by Joe Bowen.
6. Provide copies of all documents related to customer specifications that Enviro-Safe has provided to Aeropres for products sold to Enviro-Safe.
  - a. Specifications attached. Response developed and prepared by Mark Rivers
7. Describe the processes Aeropres uses to manufacture, formulate, or otherwise create all products sold to Enviro-Safe.
  - a. Aeropres uses a molecular sieving process to remove sulfur and moisture from feedstocks. Aeropres then blends to specification, analyzes and ships in dedication vessels ranging from cylinders to railcars. Response prepared and submitted by Mark Rivers
8. Describe any blending, mixing, combining of ingredients, or additions (including but not limited to scent and color) for all products sold to Enviro-Safe which are unique to products sold to Enviro-Safe.
  - a. Aeropres does not perform any additional steps regarding products provided to Enviro-Safe outside the normal scope of our processing and

blending procedures. Further, no products sold to Enviro Safe are unique.  
Response prepared and submitted by Mark Rivers

9. Provide all advertising, marketing, or product information materials related to all products sold to Enviro-Safe, including copies of internet pages.
  - a. There are no advertising, marketing or product information materials specifically related to products sold to Enviro Safe other than product specifications and MSDS sheets. Our website can be viewed at [www.aeropres.com](http://www.aeropres.com). Response developed and prepared by Joe Bowen.
10. Provide the Material Safety Data Sheets (MSDS) and Certificate of Analysis sheets for all products Aeropres sells to Enviro-Safe.
  - a. See attached. Response prepared and submitted by Mark Rivers
11. State the total annual sales, in dollars, of each product sold to Enviro-Safe since January 1, 2010
  - a. Dollar sales for the time periods in question are attached.  
Response prepared and submitted by Joe Bowen.
12. State the annual production of each product sold to Enviro-Safe for the last five years preceding this request.
  - a. Annual volumes, in gallons, are attached for the time periods requested. Response developed and prepared by Joe Bowen.
13. Does Aeropres manufacture, formulate, or otherwise create the substance known as "ES-22a"? If so, provide all documentation of notices of intent submitted to EPA under 40 C.F.R. § 82.176(a) (the Significant New Alternatives Program), including any correspondence with EPA and materials submitted for review.
  - a. Aeropres does not manufacture the Enviro-Safe substance known as ES-22a and should not be associated with the Aeropres substance known as A-22. The MSDS's of these products reflects that these substances are at two different vapor pressures and the molecular concentrations are different. MSDS's have been provided. Response prepared and submitted by Mark Rivers
14. List any known applications of the substance known as "Aeropres 22 (A-22)".
  - a. All Aeropres products are used in the propellant, blowing agent, refrigeration, and specialty chemical businesses. Response prepared and submitted by Mark Rivers
15. Are the products purchased by Enviro-Safe "stock" items, that are, items which Aeropres has manufactured, formulated, or otherwise created for other customers, and have usually kept in stock?
  - a. Aeropres blends the products as the orders are placed and does not keep items "in stock". These products are not specific to Enviro-Safe and are used by other companies. Response prepared and submitted by Mark Rivers

Note all records associated with this request have been added to the flash drive enclosed labeled EPA Request. The data has been separated into folders labeled for the question they represent.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibilities for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to section 113(c) (2) of the clean air act and 18U.S.C. 1001 and 1341.

---

Mark Rivers  
Vice President Technical Services  
Aeropres Corporation  
Office 318-213-1206  
Fax 866-472-0631



Aerosol Propellants ♦ Blowing Agents ♦ Industrial Chemicals  
ISO 9002 Certified